

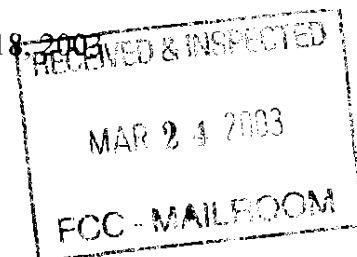


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March 18, 2003



Ms. Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th St. SW
Washington DC 20554

Re: *Ex Parte Presentation*: In the Matter of Implementation of Section 304 of the Telecommunications Act of 1996: Commercial Availability of Navigation Devices: CS
Docket No: 97-80

Dear Ms. Dortch:

On March 17 2003 the undersigned, on behalf of the Consumer Electronics Association met with Legal Advisor to Commissioner Adelstein Sarah Whitesell, Legal Advisor to Commissioner Abernathy Stacy Robinson; Legal Advisors to Commissioner Copps Jordan Goldstein and Alex Johns; and Legal Advisor to Commissioner Martin Katherine Bohigian. I was accompanied at these meetings by John Godfrey, Senior Manager, Government Affairs, Sony Electronics and Adam Goldberg, Manager, Standards, Sharp Laboratories of America.

The purpose of the meetings was to express CEA's support for the current FCC regulations requiring common reliance on the POD-Host Interface for new navigation devices placed in service after January 1, 2005. We argued that any relaxation of this requirement would have a negative impact on cable consumers and on marketplace competition for cable products.

We stated, on behalf of CEA and the members of its Video Division Board's Cable Working Group -- all signatories to the December 19 Memorandum of Understanding between the cable and consumer electronics industries -- that this agreement neither addressed nor contemplated any relaxation of the 2005 date. Nor does it provide any rationale for the relaxation of this important rule.

We further noted that the POD-Host Interface technology is complex and currently untested in the U.S. marketplace. For this reason, it would cause CE manufacturers serious concern if cable operators were to pursue a different technological direction than the one specified for competitive entrant products. Only the necessity to rely on the FOD-Host Interface will provide all cable operators with an incentive to ensure that the POD-Host Interface and POD-equipped products work reliably for consumers. At the same time, reliance on a common interface will set into motion a positive market dynamic that will ease the regulatory and oversight burden on the FCC in attempting to measure the degree to which competitive products are adequately supported.

Very truly yours,
[Signature]

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Additionally, we spoke in support of the filing regarding POD and interface cost provided to the Commission by SCMS Microsystems. We noted that, unlike other parties whose estimates of POD-Host Interface costs are entirely theoretical, SCMS Microsystems has significant experience deploying POD and Conditional Access technologies in the marketplace. and is presently filling orders, from Korean MSOs, for identical products.

This letter is being provided to your office in accordance with Section 1.1206 of the Federal Communications Commission rules. A copy of this notice has been delivered to the parties listed below

Sincerely.

A handwritten signature in black ink, appearing to read 'Michael Petricone', with a stylized, cursive script.

Michael Petricone

cc: Katherine Bohigian
Jordan Goldstein
Alex Johns
Stacy Robinson
Sara Whitesell